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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ABOLFAZL HOSSEINPOUR,	)	CASE NO.: 2:18-CV-01371-JAD-CWH
	)	
Plaintiff,	)	
	)	<b><u>STIPULATION AND ORDER TO</u></b>
vs.	)	<b><u>EXTEND DEADLINES</u></b>
	)	
LIBERTY LIFE ASSURANCE COMPANY	)	<b>(FIRST REQUEST)</b>
OF BOSTON as Claims Administrator for	)	
the Safeway, Inc. Group Disability Income	)	
Plan; DOES I through V; and ROE	)	
CORPORATIONS I through V, inclusive,	)	
	)	
Defendants.	)	

IT IS HEREBY STIPULATED by the parties hereto, by and through their undersigned counsel of record that, pursuant to LR 26-4, the discovery schedule as set forth in the Scheduling Order dated September 25, 2018 [docket 12], be amended as follows:

**I. Discovery Completed**

Defendant provided the proposed Administrative Record (AR) to Plaintiff for review on October 10, 2018. Plaintiff notified Defendant of his position as to the content of the AR, and served discovery requests, on November 13, 2018. Defendant served its objections and responses to the requests on December 12, 2018. The Joint Administrative Record (AR) was filed with this Court on November 28, 2018.

**II. Discovery Remaining and Reason for Request for Extension**

FRCP Rule 52/56 motions are currently due by January 16, 2019. The parties have

1 discussed the possibility of entering into settlement negotiations. Counsel for Plaintiff is in  
2 the process of moving offices by the end of the month, and will require additional time to  
3 fully engage in active settlement discussions with her client before the current motions  
4 deadline. The parties therefore wish to extend the motion deadline by 45 days to allow for  
5 possible settlement.

6 **III. Proposed Discovery Schedule**

7 Plaintiff HOSSEINPOUR and Defendant LIBERTY agree and stipulate to the  
8 following proposed deadline extensions:

<u>Description:</u>	<u>Current Deadline:</u>	<u>Proposed:</u>
FRCP Rule 52/56 Motions	01/16/19	03/01/19
Responses to Motions	02/06/19	03/22/19
Replies	02/20/19	04/05/19

13 We, the undersigned, represent to the Court that this request for extension is made in  
14 good faith and not for purposes of delay.

15 WHEREFORE, the parties jointly request that this Court adopt the proposed  
16 scheduling deadlines as indicated above.

17 DATED: January 11, 2019

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18  
19 By: /s/ Julie A. Mersch  
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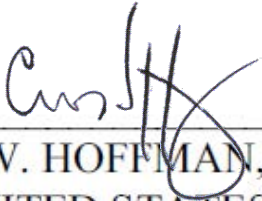
1 DATED: January 11, 2019

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RADEMAEKERS, P.C.

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17 *Attorneys for Defendant LIBERTY*  
18 *LIFE*

19 IT IS SO ORDERED.

20 DATED: Jan 14, 2019

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22   
23 C.W. HOFFMAN, JR.  
24 UNITED STATES MAGISTRATE JUDGE  
25  
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